

[Submitting Counsel on Signature Page]

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

This Document Relates to:

ALL ACTIONS

MDL No. 3047

Case No. 4:22-md-03047-YGR

**PLAINTIFFS' UNOPPOSED
ADMINISTRATIVE MOTION FOR
LEAVE TO FILE SUPPLEMENTAL
AUTHORITY**

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 7-11 and 7-3(d), the State Attorneys General, Personal Injury, and School District/Local Government Entity Plaintiffs (collectively, “Plaintiffs”) submit this Unopposed Administrative Motion for Leave to File Supplemental Authority to bring to the Court’s attention the recent rulings in *NetChoice, LLC v. Reyes*, No. 2:23-cv-00911-RJS-CMR (D. Utah July 22, 2024) (attached hereto as **Exhibit A**), *State v. Meta Platforms, Inc.*, No. 23-CV-4453 (Vt. Super. Ct. July 29, 2024) (attached hereto as **Exhibit B**), *Utah Div. of Consumer Protection v. Meta Platforms, Inc.*, No. 230908060 (Utah 3d Jud. Dist. Ct. July 25, 2024) (attached hereto as **Exhibit C**), and *State v. Meta Platforms, Inc.*, No. D-101-CV-2023-02838 (N.M. 1st Jud. Dist. Ct. June 21, 2024) (attached hereto as **Exhibit D**).

Plaintiffs submit these decisions in support of their arguments raised in the following

1 briefs:

2 (1) Personal Injury and School District/Local Government Entity Plaintiffs' Opposition
 3 to Defendants' Joint Motion to Dismiss Pursuant to Rule 12(b)(6) Plaintiffs' Non-
 4 Priority Claims (ECF No. 597);
 5 (2) Personal Injury and School District/Local Government Entity Plaintiffs' Opposition
 6 to Defendants' Motions to Dismiss the Personal Injury Plaintiffs' Consumer
 7 Protection Claims (Count 7) and Meta's Motion to Dismiss the Personal Injury
 8 Plaintiffs' Misrepresentation Claims (Counts 8-9) (ECF No. 600);
 9 (3) Personal Injury, and School District/Local Government Entity Plaintiffs' Opposition
 10 to Defendants' Motion to Dismiss the School District and Local Government Entities'
 11 Master Complaint (ECF No. 668); and
 12 (4) State Attorneys General Plaintiffs' Opposition to Defendants' Motion to Dismiss the
 13 Multistate Attorneys General Complaint and Florida Attorney General Complaint
 14 (ECF No. 599).

15 Plaintiffs submit this authority via Administrative Motion rather than a Statement of
 16 Recent Decision because Civil Local Rule 7-3(d) provides that Statements of Recent Decision
 17 must be submitted "before the noticed hearing date." Civil L.R. 7-3(d)(2). The four decisions
 18 subject to this Administrative Motion were issued after the completion of briefing and argument
 19 on the motions listed above.

20
 21 DATED: August 1, 2024

Respectfully submitted,

22
 23 By: /s/ Lexi J. Hazam

24
 25 LEXI J. HAZAM
 26 LIEFF CABRASER HEIMANN &
 27 BERNSTEIN, LLP
 28 275 BATTERY STREET, 29TH FLOOR
 SAN FRANCISCO, CA 94111-3339
 Telephone: 415-956-1000
 lhazam@lchb.com

PREVIN WARREN

MOTLEY RICE LLC
401 9th Street NW Suite 630
Washington DC 20004
Telephone: 202-386-9610
pwarren@motleyrice.com

Co-Lead Counsel

CHRISTOPHER A. SEEGER
SEEGER WEISS, LLP
55 CHALLENGER ROAD, 6TH FLOOR
RIDGEFIELD PARK, NJ 07660
Telephone: 973-639-9100
cseeger@seegerweiss.com

Counsel to Co-Lead Counsel

JENNIE LEE ANDERSON
ANDRUS ANDERSON, LLP
155 MONTGOMERY STREET, SUITE 900
SAN FRANCISCO, CA 94104
Telephone: 415-986-1400
jennie@andrusanderson.com

Liaison Counsel

**MICHAEL M. WEINKOWITZ
LEVIN SEDRAN & BERMAN, LLP
510 WALNUT STREET
SUITE 500
PHILADELPHIA, PA 19106
Telephone: 215-592-1500
mweinkowitz@lfsbalw.com**

**MELISSA YEATES
KESSLER TOPAZ MELTZER & CHECK
LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
myeates@ktmc.com**

Co-Chairs of Local Government Entity Subcommittee

EMILY C. JEFFCOTT
MORGAN & MORGAN
633 WEST FIFTH STREET, SUITE 2652

LOS ANGELES, CA 90071
Telephone: 213-787-8590
ejeffcott@forthepeople.com

JOSEPH VANZANDT
BEASLEY ALLEN
234 COMMERCE STREET
MONTGOMERY, LA 36103
Telephone: 334-269-2343
joseph.vanzandt@beasleyallen.com

Federal/State Liaisons

MATTHEW BERGMAN
GLENN DRAPER
SOCIAL MEDIA VICTIMS LAW CENTER
821 SECOND AVENUE, SUITE 2100
SEATTLE, WA 98104
Telephone: 206-741-4862
matt@socialmediavictims.org
glenn@socialmediavictims.org

JAMES J. BILSBORROW
WEITZ & LUXENBERG, PC
700 BROADWAY
NEW YORK, NY 10003
Telephone: 212-558-5500
jbilsborrow@weitzlux.com

JAYNE CONROY
SIMMONS HANLY CONROY, LLC
112 MADISON AVE, 7TH FLOOR
NEW YORK, NY 10016
Telephone: 917-882-5522
jconroy@simmonsfirm.com

ANDRE MURA
GIBBS LAW GROUP, LLP
1111 BROADWAY, SUITE 2100
OAKLAND, CA 94607
Telephone: 510-350-9717
amm@classlawgroup.com

**ALEXANDRA WALSH
WALSH LAW
1050 Connecticut Ave, NW, Suite 500
Washington D.C. 20036
Telephone: 202-780-3014**

1 awalsh@alexwalshlaw.com

2 Plaintiffs' Steering Committee Leadership

3 RON AUSTIN
4 **RON AUSTIN LAW**
5 400 MANHATTAN BLVD.
6 HARVEY, LA 70058
Telephone: 504-227-8100
raustin@ronaustinlaw.com

7 PAIGE BOLDT
8 **WALSH LAW**
9 4 Dominion Drive, Bldg. 3, Suite 100
San Antonio, TX 78257
10 Telephone: 210-448-0500
PBoldt@alexwalshlaw.com

11 THOMAS P. CARTMELL
12 **WAGSTAFF & CARTMELL LLP**
13 4740 Grand Avenue, Suite 300
Kansas City, MO 64112
14 Telephone: 816-701-1100
tcartmell@wcllp.com

15
16 SARAH EMERY
17 **HENDY JOHNSON VAUGHN EMERY PSC**
18 600 WEST MAIN STREET, SUITE 100
LOUISVILLE, KY 40202
Telephone: 859-600-6725
19 semery@justicestartshere.com

20 CARRIE GOLDBERG
21 **C.A. GOLDBERG, PLLC**
16 Court St.
22 Brooklyn, NY 11241
Telephone: 646-666-8908
23 carrie@cagoldberglaw.com

24 RONALD E. JOHNSON, JR.
25 **HENDY JOHNSON VAUGHN EMERY PSC**
600 WEST MAIN STREET, SUITE 100
26 LOUISVILLE, KY 40202
Telephone: 859-578-4444
27 rjohnson@justicestartshere.com

28 SIN-TING MARY LIU

**AYLSTOCK WITKIN KREIS &
OVERHOLTZ, PLLC**
17 EAST MAIN STREET, SUITE 200
PENSACOLA, FL 32502
Telephone: 510-698-9566
mliu@awkolaw.com

JAMES MARSH
MARSH LAW FIRM PLLC
31 HUDSON YARDS, 11TH FLOOR
NEW YORK, NY 10001-2170
Telephone: 212-372-3030
jamesmarsh@marshlaw.com

**JOSEPH E. MELTER
KESSLER TOPAZ MELTZER & CHECK
LLP
280 KING OF PRUSSIA ROAD
RADNOR, PA 19087
Telephone: 610-667-7706
jmeltzer@ktmc.com**

HILLARY NAPPI
HACH & ROSE LLP
112 Madison Avenue, 10th Floor
New York, New York 10016
Telephone: 212-213-8311
hnappi@hrsclaw.com

EMMIE PAULOS
LEVIN PAPANTONIO RAFFERTY
316 SOUTH BAYLEN STREET, SUITE 600
PENSACOLA, FL 32502
Telephone: 850-435-7107
epaulos@levinlaw.com

RUTH THI RIZKALLA
THE CARLSON LAW FIRM, PC
1500 ROSECRANS AVE., STE. 500
MANHATTAN BEACH, CA 90266
Telephone: 415-308-1915
rrizkalla@carlsonattorneys.com

**ROLAND TELLIS
DAVID FERNANDES
BARON & BUDD, P.C.
15910 Ventura Boulevard, Suite 1600**

Encino, CA 91436
Telephone: 818-839-2333
rtellis@baronbudd.com
dfernandes@baronbudd.com

DIANDRA "FU" DEBROSSE
ZIMMERMANN
DICELLO LEVITT
505 20th St North
Suite 1500
Birmingham, Alabama 35203
Telephone: 205-855-5700
fu@dicelloselevitt.com

Plaintiffs' Steering Committee Membership

1 **PHILIP J. WEISER**
2 Attorney General
3 State of Colorado

4 /s/ Bianca E. Miyata
5 Bianca E. Miyata, CO Reg. No. 42012,
6 *pro hac vice*
7 Senior Assistant Attorney General
8 Lauren M. Dickey, CO Reg. No. 45773,
9 *pro hac vice*
10 First Assistant Attorney General
11 Megan Paris Rundlet, CO Reg. No. 27474
12 Senior Assistant Solicitor General
13 Elizabeth Orem, CO Reg. No. 58309
14 Assistant Attorney General
15 Colorado Department of Law
16 Ralph L. Carr Judicial Center
17 Consumer Protection Section
18 1300 Broadway, 7th Floor
19 Denver, CO 80203
20 Phone: (720) 508-6651
21 bianca.miyata@coag.gov

22 *Attorneys for Plaintiff State of Colorado, ex rel.*
23 *Philip J. Weiser, Attorney General*

24 **ROB BONTA**
25 Attorney General
26 State of California

27 /s/ Megan O'Neill
28 Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)
Marissa Roy (CA SBN 318773)
Brendan Ruddy (CA SBN 297896)
Deputy Attorneys General
California Department of Justice
Office of the Attorney General
455 Golden Gate Ave., Suite 11000
San Francisco, CA 94102-7004
Phone: (415) 510-4400
Fax: (415) 703-5480

1 Megan.Oneill@doj.ca.gov

2 *Attorneys for Plaintiff the People of the State of*
 3 *California*

4 **RUSSELL COLEMAN**

5 Attorney General
 Commonwealth of Kentucky

6 /s/ J. Christian Lewis

7 J. Christian Lewis (KY Bar No. 87109),
Pro hac vice
 8 Philip Heleringer (KY Bar No. 96748),
Pro hac vice
 9 Zachary Richards (KY Bar No. 99209),
Pro hac vice
 10 Daniel I. Keiser (KY Bar No. 100264),
Pro hac vice
 11 Matthew Cocanougher (KY Bar No. 94292),
Pro hac vice
 12 Assistant Attorneys General
 13 1024 Capital Center Drive, Suite 200
 14 Frankfort, KY 40601
 15 CHRISTIAN.LEWIS@KY.GOV
 16 PHILIP.HELERINGER@KY.GOV
 17 ZACH.RICHARDS@KY.GOV
 18 DANIEL.KEISER@KY.GOV
 19 MATTHEW.COCANOUGHER@KY.GOV
 20 Phone: (502) 696-5300
 21 Fax: (502) 564-2698

22 *Attorneys for Plaintiff the Commonwealth of*
Kentucky

23 **MATTHEW J. PLATKIN**

24 Attorney General
 25 State of New Jersey

26 /s/ Kashif T. Chand

27 Kashif T. Chand (NJ Bar No. 016752008),
Pro hac vice
 28 Section Chief, Deputy Attorney General
 Thomas Huynh (NJ Bar No. 200942017),
Pro hac vice
 Assistant Section Chief, Deputy Attorney
 General
 Verna J. Pradaxay (NJ Bar No. 335822021),
Pro hac vice

1 Mandy K. Wang (NJ Bar No. 373452021),
2 *Pro hac vice*
3 Deputy Attorneys General
4 New Jersey Office of the Attorney General,
5 Division of Law
6 124 Halsey Street, 5th Floor
7 Newark, NJ 07101
8 Tel: (973) 648-2052
9 Kashif.Chand@law.njoag.gov
10 Thomas.Huynh@law.njoag.gov
11 Verna.Pradaxay@law.njoag.gov
12 Mandy.Wang@law.njoag.gov

13
14 *Attorneys for Plaintiff New Jersey*
15 *Division of Consumer Affairs*
16
17
18
19
20
21
22
23
24
25
26
27
28

ATTESTATION

I, Lexi J. Hazam, hereby attest, pursuant to N.D. Cal. Civil L.R. 5-1, that the concurrence to the filing of this document has been obtained from each signatory hereto.

Dated: August 1, 2024

By: s/ Lexi J. Hazam